REMARKS

Claims 1, 2, 7, 13, 14, and 22 have been amended. Claim 15 has been canceled. Claims 1-14 and 16-24 are now pending in this application.

Claims 1, 2-9, 12-16, and 20-24 stand rejected under 35 U.S.C. 102(e) as being anticipated by Donelly et al., U.S. Patent No. 6,002,800 ("Donelly"). This rejection is respectfully traversed.

Claim 1 discloses, *inter alia*, "[a]n image recognition device, for detecting arbitrary images." Further, claim 1 discloses, *inter alia*, "pattern detection means arranged and configured to recognize whether said input image includes said target pattern by comparing position data of pattern elements output by said element matching means with multiple magnification reference arrangement data of each of said target pattern elements; wherein said multiple magnification reference arrangement data corresponds to magnification levels no greater than a level at which a human eye can distinguish between an original and a non-zero magnification of the original."

Donelly discloses an image detection system for detecting an image in an input pixel stream. When Donelly detects an image, it is configured to operate under shrinkage and enlargement between 95% and 105%. However, as shown in FIGs. 14 and 16, the area disclosed is only the upper left corner of cell 26. Col. 8, lines 39-41. This is the final area that the range of values of a cell can take. This varies from the present invention because the claimed invention includes "multiple magnification reference arrangement data of each of said target pattern elements," not a small corner of a cell, such as taught in Donelly.

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Further, the "input image" in Donelly varies from the present invention as recited in claims 1, 2, 7, and 14. Donelly teaches that the input image is divided into a plurality of pieces before scanning. Col. 6, lines 11-41; FIGs. 11-16. However, the present invention scans the whole input image to detect if it includes target pattern elements having a plurality of magnifications, which are previously prepared and stored in a memory. Thus, claims 1, 2, 7, and 14 are allowable over Donelly.

Claims 3-9, 12-16, and 20-24 depend directly or indirectly from claims 1, 2, 7, or 14 and are thus allowable for the above reasons. Withdrawal of this rejection is respectfully requested.

Claims 10 and 11 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Donelly. This rejection is respectfully traversed.

Claims 10 and 11 depend from claim 7 and are thus allowable for the reasons cited above, and for other reasons.

Claim 18 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Donelly in view of Fukushima et al., U.S. Patent No. 6,185,321 ("Fukushima"). This rejection is respectfully traversed.

Claim 18 depends on claim 14 and incorporates every limitation of the independent claim. As stated above, Donelly does not disclose the same configuration of an input image as in claim 14. Fukushima does not remedy the deficiencies of Donelly. Fukushima is relied on to disclose reducing the resolution of the input image. Thus, Fukushima and Donelly do not teach or suggest all elements of the independent claims. Withdrawal of this rejection is respectfully requested.

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Claim 17 stands rejected under 35 U.S.C. 103(a) as being unpatentable over the combination of Donelly and Hasuo et al., U.S. Patent No. 5,583,614 ("Hasuo"). This rejection is respectfully traversed.

Claim 17 depends on claim 14 and incorporates every limitation of the independent claim. As stated above, Donelly does not disclose the same configuration of an input image as in claim 14. Hasuo does not remedy the deficiencies of Donelly. Hasuo is relied on to disclose changing the color of a reproduction of an input image. Thus, Hasuo and Donelly do not teach or suggest all elements of the independent claims. Withdrawal of this rejection is respectfully requested.

Claim 19 stands rejected under 35 U.S.C. 103(a) as being unpatentable over the combination of Donelly and Funada et al., U.S. Patent No. 5,257,119 ("Funada"). This rejection is respectfully traversed.

Claim 19 depends on claim 14 and incorporates every limitation of the independent claim. As stated above, Donelly does not disclose the same configuration of an input image as in claim 14. Funada does not remedy the deficiencies of Donelly. Funada is relied on to disclose superimposing alphanumeric characters on top of a reproduction of an input image. Thus, Funada and Donelly do not teach or suggest all elements of the independent claims. Withdrawal of this rejection is respectfully requested.

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In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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